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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

Foderal Communications Commission Office of the Communication

In the Matter of)
Amendment of Section 73.202 FM Table of Assignments) MM Docket No
(Larose, Louisiana)	<u> </u>

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Electronics Unlimited, Inc. ("EUI"), permitee of FM radio station KMZM(FM), Larose, Louisiana, by counsel, pursuant to Section 1.401 of the Commission's Rules, herewith submits its Petition for Rulemaking, respectfully requesting the Commission to substitute FM Channel 262C1 for 262A at Larose, Louisiana, and modify the authorized facilities of KMZM(FM), Larose, Louisiana, to specify operation on 262C1, thereby amending Section 73.202 of the Commission's Rules, FM Table of Assignment, as follows:

City		Channel	No.
Larose	e, Louisiana	262C1	

In support whereof the following is shown:

1. As reflected in the attached Technical Report prepared by Kenneth H. Larkin, Jr., the substitution of FM Channel 262C1 for 262A at Larose, Louisiana, can be made in full compliance

with all applicable minimum mileage separation and other technical requirements under the Commission's Rules, including city coverage requirements, through the imposition of a 24 kilometer SW site restriction. Further, the requested assignment can be made without requiring additional changes or substitutions in the FM Table of Assignments and without conflict to any other known proposed rulemaking.

- 2. The substitution of Channel 262C1 for 262A at Larose, Louisiana, will provide that community and the surrounding area with improved FM service. Upon issuance of an Order, implementing the requested Channel substitution, EUI will promptly prepare and file the necessary application with the Commission and, having obtained authorization to do so, will promptly construct the facilities requested.
- 3. Therefore, inasmuch as the proposed Channel substitution, requested herein, would allow for improved FM service and can be implemented in compliance with Commission Rules, EUI urges the Commission to promptly issue a Notice of Proposed Rulemaking, looking toward the implementation of the Channel substitution and the modification of the authorized facilities of KMZM(FM), Larose, Louisiana, as requested herein.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202 of its Rules by substituting FM Channel 262Cl for 262A at Larose, Louisiana, and should modify the authorized facilities of KMZM(FM), Larose, Louisiana, to specify

operation on 262C1.

Respectfully Submitted,

ELECTRONACS ANLIMITED / IN

Bv:

Timothy K. Brady

Its Attorney

P.O. Box 986 Brentwood, TN 37027-0986 (615) 371-9367

July 16, 1992

TECHNICAL DATA ELECTRONICS UNLIMITED, INC.

KLRZ (FM)

LAROSE, LOUISIANA

PETITION FOR RULEMAKING

HAS: 262A

REQ: 262C1

PREPARED JULY, 1992

PREPARED BY:

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CERTIFICATION

I, Kenneth H. Larkin, Jr., do hereby certify under penalty of perjury;

That my qualifications in telecommunications matters are of record before the Federal Communications Commission having been presented and accepted upon many occasions in the past;

That I am a consultant doing business at Nashville, Tennessee specializing in technical topics pertaining to the broadcast industry and the associated RF transmission systems;

That I have been retained by Electronics Unlimited, Inc. to perform certain technical studies and prepare this report of same:

That the accompanying technical report and exhibits were prepared by me personally or under my immediate personal supervision and that all information presented therein is true and correct of my own knowledge and belief.

Kenneth H. Larkin. Jr.

Executed on July 6, 1992

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TECHNICAL STATEMENT PETITION FOR RULEMAKING LAROSE, LOUISIANA

This statement and the associated exhibits are part of a Petition for Rulemaking seeking to upgrade the allotment of FM channel 262A at Larose, Louisiana. The statement has been prepared at the request of Electronics Unlimited, Inc.

The petition seeks to modify Section 73.202 of the Commission's Rules, the Table of FM Allotments by substituting FM channel 262C1 for channel 262A at Larose, Louisiana.

In the Commission's Report and Order in MM Docket No. 85-313 released April 29, 1986, a procedure was adopted (by amendment of Section 1.420 of the Commission's Rules) whereby FM stations or proposals could be upgraded to higher class adjacent or co-channel frequencies.

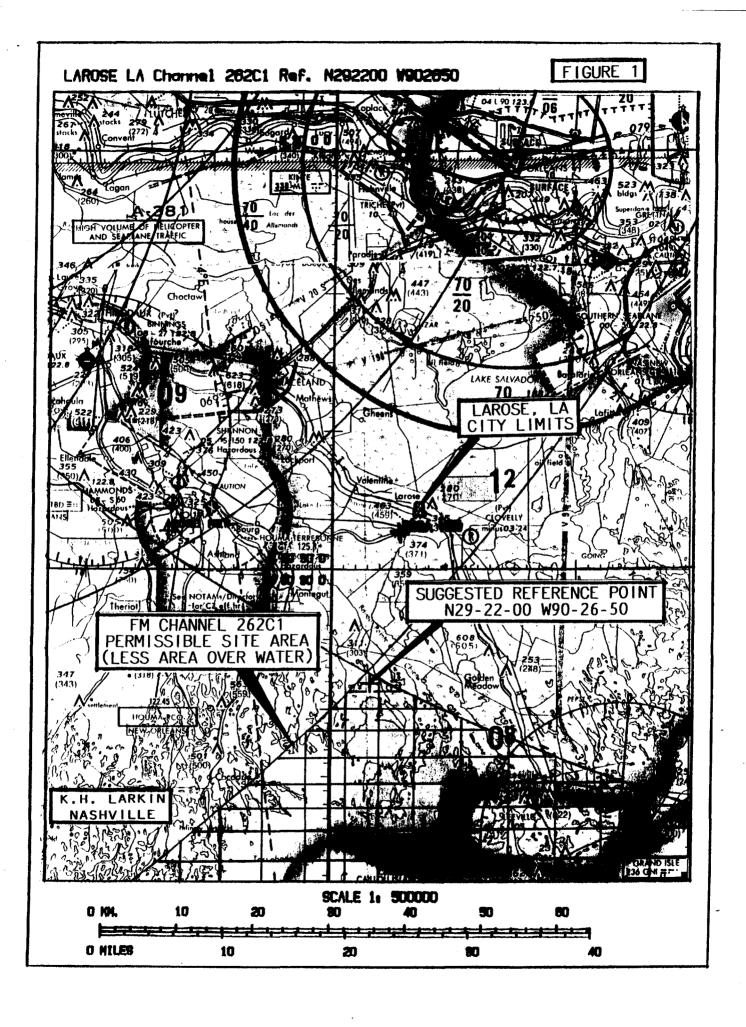
As shown on attached Figure 1, an area exists for which a channel 262C1 transmitter site could be located while providing required city grade coverage of the community of Larose, Louisiana. A suggested reference point is North Latitude 29-22-00 West Longitude 90-26-50, located approximately 24 kilometers southwest of Larose. The site restriction is necessary to meet separation requirements with respect to station KRRV at Alexandria, Louisiana on channel 262C and with respect to station WNSL at Laurel, Mississippi on channel 262C.

Figure 2 is a tabulation of allocations factors considering the distances from the proposed reference point to other pertinent facilities and proposals.

The population of Lafourche Parish is 85,860 (1990 U.S. Census Final Count) and the population of Larose is 5,772 (1990 U.S. Census Final Count).

In summary, the petitioner seeks the substitution of FM channel 262C1 for channel 262A at Larose, Louisiana. It is demonstrated in this report that suitable area exists for which a transmitter site could be located which could provide the required city grade coverage of the community of license.

Should further information be needed during the processing of this petition, please contact this office.



IDENTIFICATION OF FACILITIES FOR FM SEPARATION MAP

LAROSE LA - FIGURE 2

REFERENCE POINT: N LAT 29-22-00 W LNG 90-26-50

CEPHERCIAL FM SEPARATION STUDY FOR CHANNEL 262 C1 PER REQUIREMENTS OF 73.207 (FREQUENCY 190.3 MBZ.)

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CHAN CALL CITY AND STATE
                         CL TYP N LAT
                                         W LNS
                                                  D(Rm) D(mi) AZIMUTH ERP MAAT(M) REO'D SEP., MI
                     MS C LI 32-14-37 70-17-41 323.03 200.72 2.5238 98
259C WJMI Jackson
                                                                                104.5 km.
260C WKRS Mobile
                     AL
                         C
                            LI 30-41-20 87-49-49 291.9 101.30 59.003 94
                                                                         535
                                                                                104.5 km.
260C KTDY Lafavette
                            L1 30-12-04 91-46-33 150.3 78.363 306.22 100
                     LA
                         C
                                                                         300
                                                                                104.5 km.
262A NEW Niceville
                     FL A
                            AP 30-31-37 86-29-49 402.46 250.08 70.295 3
                                                                         100
                                                                                199.5 km.
262A NEW Miceville FL A AP 30-31-31 86-30-13 401.8 249.67 70.292 3
                                                                         100
                                                                                199.5 km.
                                                                         100
262A NEW Niceville FL A AP 30-32-03 84-20-45 404.33 251.24 70.26 2
                                                                                197.5 km.
         Niceville FL
262A NEW
                            AP 30-31-31 86-30-13 401.8 249.67 70.292 3
                                                                         100
                                                                                199.5 km.
                         A
2624 NEW
         Niceville FL
                            AP 30-27-09 86-33-27 394.46 245.11 71.185 8
                                                                         91
                                                                                199.5 km.
262A NEW
         Niceville FL A AF 30-27-10 86-33-26 394.5 245.13 71.182 3
                                                                         91
                                                                                199.5 km.
262A NEW
         Niceville FL A AP 30-30-37 86-29-45 402.01 249.8 70.552 3
                                                                         100
                                                                                199.5 lm.
         Niceville FL A
2624 NEW
                            AP 30-30-41 86-26-59 406.27 232.44 70.723 3
                                                                                199.5 km.
                                                                         82
262A NEW
         Niceville FL A AP 30-31-22 84-30-28 401.33 249.37 70.313 3
                                                                         40
                                                                                199.5 km.
262A NBJ Niceville FL
                         A AP 30-29-20 86-25-16 408.17 253.43 71.174 3
                                                                         100
                                                                                197.5 km.
262C KRRV Alexandria LA
                        C
                           LI 31-01-59 92-30-08 270.7 148.21 313.69 97
                                                                       321
                                                                                269.5 km. (CLOSE 1.2)
242A NEW Larose
                    LA A
                            AP 29-32-33 90-24-25 19.877 12.351 11.272 3
                                                                         100
                                                                                199.5 km. (SHORT-179.6)
262A NEW
                    LA A AP 29-32-46 90-24-35 20.219 12.564 10.305 3
         Larose
                                                                         100
                                                                               199.5 to. (SHORT-179.3)
262A NEW
        Larose LA A AP 29-32-33 98-24-29 19.856 12.338 10.966 3
                                                                         100
                                                                               199.5 km. (SMORT-179.6)
262C WMSL Laurel
                    MS C LI 31-31-37 89-88-87 270.61 148.15 27.386 188 325
                                                                               269.5 km. (CLOSE 1.1)
262C KILT Houston
                            L1 29-34-34 95-30-36 490.65 304.08 273.97 95
                    TX C
                                                                         585
                                                                               269.5 km.
263A NEW
        Port Bibson MS A AP 31-56-09 90-56-5; 287.37 179.81 350.0; 3
                                                                         100
                                                                               132.5 km.
263A NEW Port Bibson NS A AP 32-61-41 98-56-44 298.88 185.72 358.98 3
                                                                         100
                                                                                132.5 km.
264C WJLQ Pensacola FL C LJ 30-37-35 87-30-50 304.13 188.98 61.853 100 474
                                                                               194.5 km.
                       C1 LI 38-27-40 91-19-40 148.15 92.056 325.33 95
264C1 WTGE Baton Rouge LA
                                                                         210
                                                                               81.5 kg.
                                                                         457
264C WTBE Baton Rouge LA C CP 38-19-35 91-16-36 133.2 82.767 323.35 97
                                                                               184.5 km. (CLOSE 28.7)
245A KT99 Selpher
                                                                               74.5 km.
                    LA A LI 30-14-55 93-17-56 292.5 181.75 298.32 3
                                                                         91
265A KTOO Sulphur
                    LA A DE 30-14-55 93-17-56 292.5 181.75 290.32 0
                                                                         74.5 km.
265C3 KTOO Sulphur
                       C3 AD 30-11-08 93-14-14 204.66 176.00 209.37 0
                                                                         .
                                                                               75.5 km.
                    LA
265A WHDC Hazlehurst MS A LI 31-53-34 90-24-08 280.08 174.03 .72388 3
                                                                         87
                                                                               74.5 km.
                  LA D AP 29-32-47 90-43-23 33.359 20.728 306.88 0
2000 NBI- House
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